

Holland & Knight

31 West 52nd Street | New York, NY 10019 | T 212.513.3200 | F 212.385.9010
Holland & Knight LLP | www.hklaw.com

James H. Power
+1 212-513-3494
James.Power@hklaw.com

April 24, 2020

Via ECF

Hon. J. Paul Oetken
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Tatiana Akhmedova*, Case No. 19-mc-26
Letter Request to Keep Case Open

Dear Judge Oetken:

We are counsel for Applicant Tatiana Akhmedova (“Applicant” or “Ms. Akhmedova”) in the above-captioned action. As this Court is aware, Applicant has filed in this action two requests for orders permitting discovery in aid of certain foreign proceedings pursuant to 28 U.S.C. § 1782. Your Honor granted those applications on January 18, 2019 and April 24, 2019, respectively. Dkts. 5, 11.

This Court directed on January 7, 2020 that Applicant Ms. Akhmedova should advise the Court by February 4, 2020 whether this case can be closed. On February 4, 2020 Ms. Akhmedova requested that this case remain open in order for Ms. Akhmedova to determine whether a motion to compel against subpoena target Y.Co NY Inc. (“Y.Co NY”) will need to be filed, and in order to determine whether a supplemental application will be filed to obtain discovery from New York-located banks for certain additional discovery targets. Dkt. 24. On February 7, 2020 this Court granted the request and advised that Ms. Akhmedova should advise the Court on the status of the case by April 24, 2020. Dkt. 25.

Since Ms. Akhmedova’s last letter, she has continued to engage with Y.Co NY regarding its production of documents, including certain confidentiality issues alleged by Y.Co NY. To date, Y.Co NY has not made any disclosures pursuant to the subpoena served on it in this action. Additionally, Ms. Akhmedova has identified additional discovery targets for which a supplemental discovery application pursuant to 28 U.S.C. 1782 will be necessary in support of certain foreign litigations.

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As a result of various delays related to CoVid-19, Ms. Akhmedova requests further time to prepare and file the motions described above. Accordingly, she respectfully requests that this action remain open for an additional 90 days to allow for the filing of a supplementary application for discovery pursuant to 28 U.S.C. § 1782, and to continue consideration of whether a motion to compel Y.Co NY is necessary.

We thank the Court for its attention to this matter.

Respectfully submitted,

HOLLAND & KNIGHT LLP

A handwritten signature in blue ink that reads "James H. Power". The signature is written in a cursive, flowing style with a large initial "J" and a prominent "P".

James H. Power